

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
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DIVISION TWO

2020 SEP -3 AM 11:39

STATE OF WASHINGTON

STATE OF WASHINGTON

Respondent,

No.

54285-411

v.

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

Willie Brown

(your name)

Appellant.

I, Willie Brown, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

I WAS PUT IN Isolation unit for 16 mo NO Phone, MAIL, visit Restriction
unable To seek Different Counsel only D.A.C.
Prosecutor used Closing Argument To InFLame Prejudice of
Jury, SAYS MR. Brown WAS SCARED TO GO BACK? undue BIAS
last conviction over 10 yrs Ago. Prejudice To me
Also Shift Burden of Proof In Jury Instruction
Prosecutor showed Incorrect Time Line With me AWAY From Home
He Knew I WAS ON D.O.C SUPERVISION unable To Be AROUND MINORS

Additional Ground 2

Prosecutorial Vindictiveness, for me not TAKEN DEAL, overCharged me
Cumulative ERRORS Prejudice me; 404 B EVIDENCE In Closing Argument
The Delay TACTICS used By Prosecutor AND D.A.C
The Delay From FAKE DNA THAT HAD NO REAL VALUE
6th Amendment Rights Violated if only one Juror Biased or Influenced.
Equal Protection under The Law - Isolation for 16 mo.
1st Amendment Right To Telephone ACCESS
8th Amendment Rights EXCESSIVE BAIL CRUEL UNUSUAL Punishment.
If there are additional grounds, a brief summary is attached to this statement.

Date: _____

Signature: _____